Testimony on Behalf of Aon

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Before ERISA Advisory Council

Mandated Disclosure for Retirement Plans - Enhancing Effectiveness for Participants

August 22, 2017

Aon Testimony

Aon plc (NYSE:AON) is a leading global professional services firm providing a broad range of risk, retirement and health solutions. Our 50,000 colleagues in 120 countries empower results for clients by using proprietary data and analytics to deliver insights that reduce volatility and improve performance.

My name is Monica Gajdel, and I support and advise our firm's actuaries and pension administration practice on all matters relating to pension administration including Aon's template participant notices and communications for defined benefit plans. I am also a Fellow of the Society of Actuaries and an Enrolled Actuary. I am honored to be addressing the ERISA Advisory Council on enhancing the effectiveness of mandated disclosures.

In my role at Aon, I have a unique opportunity to understand the challenges plan sponsors face in communicating with participants in a timely and compliant manner as well as learn the reaction of participants from such disclosures as I assist my colleagues in responding to participant questions. We are the actuary for over 900 defined benefit pension plans and help employers provide many required notices including the Annual Funding Notice and the Pension Benefit Statement.

Executive Summary

Aon strongly encourages the effort to revise the information provided in the Annual Funding Notice to make it more relevant to participants and less burdensome to employers. The current notice provides confusing information, some of which is only calculated for purposes of the notice, adding unnecessary costs to maintaining a defined benefit pension plan.

My testimony will focus primarily on the Annual Funding Notice to participants; however, I will also briefly discuss the Periodic Pension Benefit Statement and the Statement of Accrued and Nonforfeitable Benefits. This testimony addresses a number of the specific requests from the Council within the suggestions provided, but also responds to specific questions in the attached appendix. In addition, comments are provided on a draft version of the Annual Funding Notice which was provided by Deborah Tully.

The notice could be improved by:

- Directing readers to the Form 5500 information on the DOL website
- Eliminating the MAP-21 Supplement or moving it to the end of the notice
- Providing meaningful plan funding information
- Eliminating year-end asset and liability information
- Simplifying the section on events having a material effect on assets and liabilities
- Using the Annual Funding Notice for other required disclosures
- Simplifying and providing flexibility for the funding and investment policies and the asset allocations
- Reducing the amount of information on plan terminations and PBGC guarantees.

We realize some of these suggestions may require changes to existing regulations and potentially the statutory requirements. However, highlighting the need for changes and clarifications may help identify areas of improvement until such statutory or regulatory changes can be made.

Annual Funding Notice

The Annual Funding Notice is not only a burdensome and problematic disclosure required of all pension plan sponsors, but also one of the most confusing notices participants receive. The length and detail of the notice, even if intended to be written in a simple manner, make it difficult for participants to understand or receive any information of value.

As Aon performs benefit center outsourcing services, we receive many participant questions on this notice each year. In some cases, participants are concerned the plan is disappearing due to the plan termination information included. Some participants are confused between defined benefit plan assets and 401(k) plan assets, and believe the information in the notice describes how their specific benefit is invested or that the dollar amounts shown are somehow allocated specifically to them. Some think their benefit changes with asset or funding percentage changes. Many continue to simply ask why they are receiving the statement.

The vast majority of plan sponsors use the model notice provided by the Department of Labor (DOL) under ERISA section 2520. Changes to that model would greatly improve the usefulness of the information that participants receive about the funded level of their pension plan.

Current Deficiencies in the Annual Funding Notice

The fact that participants don't know why they are getting this information seems to indicate that the current disclosure is providing only limited value. The intent of the notice requirement appears to be to make participants aware of the financial strength of their pension plan and provide detail on PBGC protection and the guarantees that may apply in the event of plan termination. With additional required disclosures (Supplement) added to the notice due to the Moving Ahead for Progress in the 21st Century Act of 2012 (MAP-21) for many plans, the notice has become more confusing, less relevant and likely not reviewed by most participants. For example, due to the Supplement, the following model language is the **first** information presented to a participant, for a notice that is eight pages long:

> *This is a temporary supplement to your annual funding notice. It is required by a new federal law named Moving Ahead for Progress in the 21st Century Act (MAP-21). MAP-21 changed how pension plans calculate their liabilities. The purpose of this supplement is to show you the effect of these changes. Prior to MAP-21, pension plans determined their liabilities using a two-year average of interest rates. Now pension plans also must take into account a 25-year average of interest rates. This means that MAP-21 interest rates likely will be higher and plan liabilities lower than they were under prior law. As a result, your employer may contribute less money to the plan at a time when market interest rates are at or near historical lows.*

This is followed by a table including six columns of information, all with technical terminology a participant is not likely to understand. Most participants will have little idea what it is for, whether they need to take action, and whether the information is showing something positive or negative.

The notice provides financial information that is not logical or comparable, and includes information that does not provide a participant with any context or understanding of what the information means. For instance, the information disclosed as "year-end" assets and liabilities uses a different measure of assets than provided on the first page. For plans using a smoothed value of assets, there's no way to compare values in the chart of assets to this year-end asset value, and the additional description provided doesn't help. Moreover, the assets cannot reflect the required contribution that must be made to the plan but which can be made after the end of the plan year. Also, the liabilities provided in this "year-end" section are valued using different assumptions, and thus could never be arrived at using other information in the statement. These year-end values also aren't comparable to the liabilities shown in the following year's statement. Disclosing this year-end information under a second assumption basis is a burden for sponsors. It also makes little sense from a comparison perspective or for understanding a year-to-year change in the information in the notice, and renders much of the information provided in this section useless.

The extent of the overall requirements makes the notice too long for most participants to review. It's difficult to understand what information is important and what information is actionable (i.e., none). For instance, disclosure of information that a plan sponsor needed to file with the PBGC under ERISA section 4010 is required. Yet, that information cannot be made available and it has no meaning to participants. Because the same text is included year after year, participants simply do not review the notice. Employee organizations use experts to explain the information during annual meetings because there is no context to the information presented.

The most effective way to increase the value of the notice to participants would be to reduce the amount of information provided and simplify the numerical information to provide a more meaningful comparison. The following are specific areas of the Annual Funding Notice that should be reviewed for revisions. In addition, attached is a sample Annual Funding Notice reflecting these improvements.

Suggestions for Improvements

1. Direct readers to the Form 5500 information on the DOL website

Detailed plan information which provides much of the information required in the Annual Funding Notice is available on the DOL EFAST website. Where possible, users should be directed to that information to reduce the length and detail of the notice. Form 5500's are available on a timely basis after they are filed. In order to make this easy, the plan's EIN and plan number should be included in the same section and a link to the specific area for information (vs. the generic DOL website) should be provided. For example:

> We are required to file detailed information about the plan each year in a Form 5500 filing. This filing includes assets and investments, participant counts, and other information about the plan. It also includes information on the assumptions and methods used to determine the plan liabilities and assets provided in this notice.
>
> The most recent filing can be found on our website at www.xxxxxxx.com. You can also access this filing by going to the Department of Labor EFAST filing website at: https://www.efast.dol.gov.
> Enter the plan's EIN of 1234567789 and plan number of "001" to access the plan-specific information.

2. Eliminate the MAP-21 Supplement

The MAP-21 Supplement to the Annual Funding Notice is confusing and burdensome and should be completely eliminated. If it cannot be eliminated, additional waivers from providing the Supplement should be provided, such as waiving the disclosures for any sponsors who have made all required contributions within 60 days of the due date. In all cases where a waiver is not provided, the Supplement should be included at the end of the notice.

3. Provide meaningful plan funding information

The funding notice provides too much detail to simply tell a participant what assets are in the plan to cover liabilities, and most participants will not understand or read language that attempts to define all the technical terminology used. The notice could be improved by providing only the value of assets and liabilities based on the plan funding requirements (without artificial reduction for funding balances) and a ratio indicating how well-funded the plan is.

The information providing the funding standard carryover balance and the prefunding balance should be eliminated because they are not necessary to understand the basic funded position of the plan. This information can also be obtained from the Schedule SB. If not eliminated, the two funding balances should be combined into one “funding credit” line item for simplicity and this information should not be required if equal to $0.

Thus, the Funding Target Attainment Percentage table should provide three years of history showing:

- Valuation date
- Plan assets for funding calculations
- Plan liabilities for funding
- A ratio of assets and liabilities shown

We also suggest that plan sponsors have the flexibility to use the model notice yet insert any commentary they find useful in describing the funded status of the plan. For instance, a plan sponsor should be able to include information on the amount of contributions made to the plan which demonstrates their “annual funding.” Adding this flexibility specifically to the model notice would make more sponsors comfortable including the information.

The description of these amounts should be simple so participants aren’t confused. For example:

> ABC Company sets aside money in a trust (Plan Assets) to pay all the pension benefits currently being paid to retirees and beneficiaries as well as all the benefits that are expected to be paid in the future (“Plan Liabilities”). All pension plan payments are paid from these assets.
>
> ABC Company is required by law to add funds to the trust under specific calculation requirements. For 2017, we contributed $X to the plan trust.

If the actual Funding Target Attainment Percentage as required by statute must be disclosed, calculated using assets reduced by funding balances, we suggest providing it without detail, such as:

> In order to determine the amount that we must contribute to the plan, the funded percentage for the year was required to be determined as: X%, Y%, Z%.
>
> Or,
>
> In order to determine the amount that we must contribute to the plan, the plan was considered to be 100% funded.

Finally, at-risk liabilities should be eliminated. It is not meaningful to most participants and requires additional description in technical terminology that adds no value.

4. Eliminate year-end assets and liabilities

The notice requires assets and liabilities using a measurement and assumptions that differ from asset and liability information on the first page. Most plan participants would neither understand why there may be more than one way to measure assets and liabilities, nor how the assumptions and calculations differ for the amounts provided at year-end from the funding information provided at the beginning of the notice. In fact, even a knowledgeable user could not use that beginning-of-year information to project to the year-end amounts shown in this section. Including this information simply makes the notice longer due to necessary explanations of the differences. This additional information makes the notice more confusing and more likely to be ignored.

In addition, the end-of-year liability amount used in this disclosure has no other purpose for plan funding or payment of premiums. It is solely calculated by every plan sponsor to provide on this notice, causing additional cost for every plan for no added value.

5. Simplify the section on events having a material effect on assets or liabilities

The apparent intent of this requirement is for participants to understand when a significant future change is known but is not reflected in the funding amounts provided. However, the rules on when disclosure is required and what must be disclosed are complicated, require additional calculations, and provide no useful information to participants. The existing regulations require a calculation of the impact of the event, measured at the end of the following year. That is, the assets and liabilities provided in the statement are shown as of (e.g.) January 1, 2017. But, the impact of an event is provided as of (e.g.) December 31, 2018, a date that is two years later. Such a dollar amount cannot be used to forecast a change from the January 1, 2017 liability amount provided. And, it cannot be used to compare one notice to the following year's notice. And, there is no other information which provides information as to the importance of the event.

In addition, the regulations seem to stretch the need for disclosure to include nearly any possible changes in assets or liabilities for the plan. This is unrealistic given that plans must change assumptions annually for minimum funding purposes. Limiting events to only those which are actual plan changes would help provide clarity and simplify this for plan sponsors.

To make this information useful, a simple statement to meet this requirement should be included after the table of funding values to indicate whether or not there is a plan change expected in the following year which will impact the values that will be provided in the following year's notice. That will make a comparison from year-to-year much easier to understand. For example,

> In 2017, the pension plan multiplier will increase from $X to $Y which will increase plan liabilities by $X [or Y%].
>
> In 2017, we anticipate paying benefits in a one-time lump sum offer to terminated participants who have not yet started to receive benefits. This is expected to decrease the plan liabilities by $X and decrease assets by $Y.
>
> In 2017, we anticipate additional liabilities of $X due to the expansion of benefits to a new group of participants.

No explicit guidance is needed on how to perform that calculation other than to use generally accepted actuarial principles to determine the amount.

Also, the determination of whether an event is significant should be left to the sponsor and not be defined as a 5% threshold. Many times, plan changes may impact both assets and liabilities, leaving a plan in a similar funded position. Or, a plan sponsor may contribute additional amounts when benefits are offered. This section does not take those nuances into account and can be misleading.

Finally, this requirement overlaps with other notification requirements. Certain plan changes must be announced via an ERISA section 204(h) notice or Summary of Material Modifications. The only reason the funding notice should include a mention of plan changes is to alert participants to the fact that the following year's notice may be impacted by a known change.

6. Use the Annual Funding Notice for other required disclosures

The Council is looking for ways certain notices could be combined. There are several disclosures which could be included with the Annual Funding Notice which would provide more useful information to participants and may lead to more attention to the notice.

Plan sponsors who do not send Pension Benefit Statements every three years are required to annually notify participants of their right to request a benefit statement. This notice of the availability of a Pension Benefit Statement could be included on the first page of the notice, potentially in a call-out box, to get the attention of participants to the opportunity to get information specific to them. It would also help participants understand what benefits the notice actually pertains to. We suggest that plan sponsors have the flexibility to describe how participants can receive a benefit statement, for example,

> You can request an estimate of your current accrued pension benefit. To request a benefit estimate online, access <Site Name> at <link>. To request a free paper copy of your benefit estimate, call the <Insert> toll free at 1-999-999-9999. Representatives are available Monday thru Friday, from 8 a.m. to 5 p.m. Central time, excluding holidays.

Also, some sponsors are required to notify participants if a required contribution was not made within 60 days of the due date. This information relates directly to the funding of the plan and could be included as:

> The plan was required to receive a payment from the employer on [list applicable due date(s)]. That payment [has not been made] [was made on [list applicable payment date(s)]].

7. Simplify and provide flexibility for the funding and investment policies and the asset allocations

The statute does not require a statement regarding the investment policy and this information should be eliminated. Also, a participant interested in the plan's investments can be directed to the Form 5500 filing and this section of the funding notice could be eliminated.

The current regulations provide two alternatives to provide the percentages of assets allocated in various asset categories. Each of these is flawed.

The first alternative provides 17 asset categories using the information from the Schedule H to the Form 5500. This is too much detail to provide any meaningful information and the information can be obtained from the Form 5500 filing on the DOL website. The second alternative is to use the asset categories from line 19 of the Schedule R to the Form 5500. This is a much more simplified display but may not be available for plans with less than 1,000 participants. Also, the information may not be finalized at the time the notice is provided.

If the requirement to provide an investment breakdown is not eliminated, a model notice should only suggest the asset categories a sponsor may wish to include and rounded amounts or generalizations should be allowed.

8. Reduce the amount of information on plan terminations and PBGC guarantees

The information on PBGC plan terminations and guarantees is much too detailed. It confuses participants who are not receiving any benefits from the PBGC and the vast majority never will. This information could be reduced to a simple statement:

> The benefits in this plan are guaranteed by the PBGC up to certain maximum limits. See www.pbgc.gov for more information on this federal agency and general benefits covered. Information is also available

that details some common questions, such as what happens in the event a plan ends or what benefits the PBGC guarantees.

Specific Comments on Draft Annual Funding Notice

The Retirement Issue Team drafted an update to the Annual Funding Notice, provided by Deborah Tully. The following are general comments on that draft:

- Much of the information would be useful as frequently asked questions, which could be optionally included by plan sponsors. However, this text should not be included as part of a specific model notice.
- The text uses language to define various terms used for funding purposes. However, use of the technical terminology is not a requirement and would potentially hinder a participant's understanding of the information. It would be more effective to describe the amounts in words more relevant to a participant.
- Information and text describing benefit restrictions (two paragraphs) could be alarming to participants when few plans are currently impacted by these restrictions under interest rate stabilization. Also, separate notice requirements exist to alert participants when a restriction applies. Including this in a model safe harbor notice would cause more confusion with participants and not provide any actionable information.
- In general, the names of laws which required specific disclosures or calculations isn't important to participants. The goal should be to provide meaningful information with the least amount of technical terminology.
- As drafted, the first page begins with language a participant could find difficult to read. As a result, the participant would potentially not review any actual plan-specific information provided on later pages. Also, the text would not change year after year, resulting in participants ignoring this notice.
- Rather than opening the notice with information that says it is a standard notification, no action required, followed by information about what the notice is not, it would be helpful to briefly describe what is in this notice so a participant can choose to read it or jump to what they are interested in.
- The at-risk information, even for a plan which is in at-risk status, is too detailed and complicated. This information could be conveyed in a more straight-forward manner such as, "Since the plan's funding is below a specific level, the plan sponsor must contribute more money than otherwise required." The fact that liabilities are measured differently resulting in higher contributions isn't relevant to participants and the terms "at risk" and "Funding Target Attainment Percentage" aren't useful. However, if the information is reduced to a simple statement, participants are more likely to remember and understand that the plan is not well-funded and that requirements are in place to improve the plan's funded status.
- The use of an appendix can be helpful to contain more technical information and more information could be included the appendix.

Pension Benefit Statement

For defined benefit plans, a pension benefit statement is required to be provided once every three years, or a notification of the availability of a benefit statement must be provided annually. ERISA section 105(a)(3)(B) allows for regulations to exempt frozen plans from providing this statement. This exemption should be provided to reduce the number of duplicate statements plan sponsors are providing participants.

Statement of Accrued and Nonforfeitable Benefits

ERISA section 209(a) requires participants to receive a statement including the **total** accrued benefit and the nonforfeitable amount of benefits upon termination or upon a 1-year break in service. While it is important to notify a participant that they will not receive a benefit from the pension plan when they separate from service, providing the dollar amount of a benefit a participant cannot get (the total accrued benefit) is not useful. It requires a calculation of a benefit that is never needed, yet can be complicated to determine. For instance, an accrued benefit calculation for a plan participant with one month of service in a final average pay plan requires a determination of an average pay for one month of earnings. This is simply an added burden for plan sponsors. And, it is confusing to participants who are provided a dollar amount that is never payable. The requirement to provide the total accrued benefit should be removed when a participant is not vested in any portion of a benefit.

2017 Annual Funding Notice
for
XYZ Pension Plan

Purpose of This Information

This notice provides information about your XYZ Pension Plan. [INSERT DESCRIPTION OF PLAN SUCH AS: This pension plan provides you a monthly benefit at your retirement as described in the Summary Plan Description.] No action is necessary on your part. The following provides you with information about how much has been set aside to pay benefits and how those assets are invested, how to request a personal benefit statement, where to find more information on the plan, and where to get information about benefit guarantees provided by the Pension Benefit Guaranty[11] Corporation ("PBGC"), a federal insurance agency.

Plan Funding

ABC Company sets aside money in a trust (Plan Assets) to pay all the pension benefits currently being paid to retirees and beneficiaries, as well as all the benefits that are expected to be paid in the future ("Plan Liabilities"). All pension plan payments are paid from these assets. The following are the plan assets and liabilities for the past three years, used to determine the amount of money ABC Company must contribute to the plan.

1. Date	[insert date]	[insert date]	[insert date]
2. Plan Assets	[insert amount]	[insert amount]	[insert amount]
3. Plan Liabilities	[insert amount]	[insert amount]	[insert amount]
4. Percent of Liabilities Funded by Current Assets (line 2 divided by line 3)	[insert percentage]	[insert percentage]	[insert percentage]

Event: In 2017, the pension plan multiplier will increase from $A to $B which will increase plan liabilities by $X [or Y%].

ABC Company is required by law to add funds to the trust under specific calculation requirements. For 2017, we contributed $X to the plan trust. [ONLY IF NECESSARY: The plan was required to receive a payment from the employer on [due date(s)]. That payment [has not been made] [was made on date(s)].] In order to determine the amount that we must contribute to the plan, the funded percentage for the year was required to be determined as: X%, Y%, Z%. [ALTERNATIVE, IF THE PLAN IS 100% FUNDED: In order to determine the amount that we must contribute to the plan, the plan was considered to be 100% funded.]

Plan assets are generally allocated among the following asset investment categories:

Assets invested in:	**Approximate Allocation**
Stocks	X%
Bonds	X%
Real Estate	X%
Other	X%

Information about Your Specific Benefit in the Plan

You can request an estimate of your current accrued pension benefit. To request a benefit estimate online, access <Site Name> at <link>. To request a free paper copy of your benefit estimate, call the <Insert> toll free at 1-999-999-9999. Representatives are available Monday thru Friday, from 8 a.m. to 5 p.m. Central time, excluding holidays.

<In order to estimate your current accrued benefit at <link>, select a termination date of today's date and select a benefit start date equal to your Normal Retirement Date in the plan (usually age 65). To project a future benefit, you may also select a projected termination date or an alternate benefit start date.>

Where to Get More Information

We are required to file detailed information about the plan each year in a Form 5500 filing. This filing includes assets and investments, participant counts, and other information about the plan. It also includes information on the assumptions and methods used to determine the plan liabilities and assets provided in this notice.

The most recent filing can be found at [*INSERT SPONSOR-SPECIFIC INTRANET SITE*.] You can also access this filing by going to the Department of Labor EFAST filing website at: https://www.efast.dol.gov.

- Select “Form 5500/5500SF Search.”
- Enter the plan’s EIN of <1234567789> and plan number of <001> to access the plan-specific information.

More Information

If you need additional information, call the [plan administrator or benefit center] toll-free at 1-999-999-9999 between 9 a.m. and 5 p.m., Central time, Monday through Friday, excluding holidays.

A copy of the Summary Plan Description is available at: [*INSERT*.]

Information about PBGC Guarantees

The benefits in this plan are guaranteed by the PBGC up to certain maximum limits. See www.pbgc.gov for more information on this federal agency and general benefits covered. Information is also available that details some common questions, such as what happens in the event a plan ends or what benefits the PBGC guarantees.

Appendix – Council-Specific Questions

The following address the specific questions provided by the Council:

A. *Are there duplicative disclosure requirements and/or specific disclosures that could be eliminated or combined to relieve the burden on the plan sponsor and/or the participants/beneficiaries?*

Response:
The following notices for defined benefit plans could be combined:

The Annual Notice of Availability of a Pension Benefit Statement should be combined with the Annual Funding Notice. It wouldn't be missed or forgotten. Participants would get a better understanding of the benefit to which the funding notice applies. And, the notice would get more attention.

If a disclosure is required under ERISA section 101(d) when a contribution is unpaid after more than 60 days, the information should be provided in the Annual Funding Notice to make it relevant to a participant.

The following notice for defined benefit plans could be eliminated:

The Suspension of Benefits notice to employed participants should be eliminated. ERISA section 203(a)(3)(B) provides that a right to an accrued benefit is not treated as forfeitable if it is suspended for a period of employment **subsequent** to the commencement. However, regulation section 2520.203-3 applies this requirement to participants who are employed and never commenced payments as well as to "rehired" participants. This notice to actively employed participants at normal retirement age is unnecessary and confusing. It provides information that the pension benefit will not be paid while employed, yet the only action a participant can take is to terminate employment. Also, this information arrives unsolicited, and is concerning to participants because it discusses employment at an older age.

In some cases, plan sponsors may inadvertently miss providing this notice and a correction is typically implemented where a participant receives an actuarially increased benefit. This can result in benefit amounts that differ for individuals who received notices vs. those who did not.

B. *Is the content of the disclosures understandable and are there specific recommendations and examples that can be provided to improve the communication of the content in existing disclosures?*

Response:
Many times, disclosures include technical terminology that must be described, making notices longer. Or, notices include information about how they are "required by law." If information is important for a participant, just provide the information and nothing more. Describe it in terminology the average person would use and not the language of the rules.

C. *Are disclosures readable in accordance with federal plain language guidelines?*

Response:
While most notices may be "readable," they tend to provide too much detail and participants end up reading nothing. Reducing the amount of information in any notice should be a goal.

D. *Are the disclosures valuable to users and are the disclosures material to a participant's understanding of the plan and their decision making?*

Response:
Some notices provide no actionable information and are repeated year after year making them irrelevant. These sorts of disclosures should be eliminated or reduced in size.

E. *When should disclosures be made to participants to optimize the objective of the specific disclosures?*

Response:
If disclosures are "information only," they should be sent together, at the same time each year. Sponsors should have some flexibility in when such "information only" notices are sent so as not to distract from more important "actionable" ones.

F. *Should the disclosures indicate "Action Required"; "Action Requested"; "No Current Action Required"; "For Information Purposes Only" or other introductory comments to inform participants of their purpose?*

Response:
Introductory comments should be specific. Too many generic comments are ignored. For example, rather than "Action Required," a notice should state what action is needed. Also, "For Information Only" tends to be ignored. Instead of an introduction that implies "don't bother reading this," the first paragraph should say no action is needed.

G. *Would a 'Summary'/Quick Start Guide" to disclosures help achieve the above objectives?*

Response:
This should be included only for longer notices or Summary Plan Descriptions where reference information is needed. For example, many new cars now come with "skinny versions" of the manual which provide just the most common questions and answers.

H. *What is/are the most effective and efficient methods of design and distribution?*

Response:
Materials that are colorful or have more than just plain text are most effective. However, that may add costs and shouldn't be required especially for less important notices.

Delivering content via the internet provides participants with much more accessible and useable information. It can be designed with links to other important information or places to get participant-specific information.

I. How do the above considerations differ between small, medium and large single and multiemployer plans?

Response:
Small plans (or small companies with small plans) may benefit the most from model notices which help to reduce costs of plan sponsorship. Small plans also shouldn't be required to design notices in a more costly way (e.g., color production).